

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA	*	CRIMINAL NO.: 09-055
v.	*	SECTION: "C"
SHONDRA IRVING	*	

* * *

FACTUAL BASIS

Should this matter have gone to trial, the Government would have proved, through the introduction of competent testimony and admissible tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the Indictment now pending against the defendant, SHONDRA IRVING. The defendant has agreed to plead guilty to Count I of the Indictment charging her with Conspiracy to Commit Bank Fraud in violation of Title 18, United States Code, Section 371.

On or around February 12, 2008, SHONDRA IRVING was living in Houston, Texas and was recruited by Eddie Matthews ("Matthews") to cash altered checks in the Eastern District of Louisiana and elsewhere. Matthews told IRVING to bring her birth certificate, social security card and nursing scrubs with her to Baton Rouge, Louisiana. IRVING met Matthews at a bus station

in Baton Rouge, Louisiana and drove IRVING to New Orleans, Louisiana where IRVING obtained a Louisiana Identification card from the Louisiana Department of Motor Vehicles.

In or about February 2008, Matthews drove IRVING to various banks to cash stolen checks from residential mail boxes which Matthews had altered by “washing” the checks with a paint thinner like substance which was purchased at a Walmart retail outlet. These checks were stolen from residential mail boxes by Matthews and/or by persons known to Matthews. Matthews altered the stolen checks by making the checks payable to IRVING. Matthews also altered the stolen checks so as to increase the amount of the check and Matthews forged the account holder’s signature. In the memo section of the altered check Matthews wrote “mother’s care staff”.

On or about February 13, 2008, and during the course and in furtherance of the conspiracy, IRVING fraudulently presented and cashed an altered check in the amount of \$985.00 at Regions Bank in Kenner, Louisiana, a bank whose deposits were insured by the Federal Deposit Insurance Corporation. IRVING knew the check to have been fraudulently and falsely altered by Matthews. IRVING presented a Louisiana Identification Card No. 009673473 to the Regions Bank teller when she presented the altered check. U.S. Postal Inspectors confirmed the Louisiana Identification Card No. 009673473 was issued to SHONDRA IRVING. A video recording showing SHONDRA IRVING cashing the altered check at Regions Bank would be offered as evidence at trial. After cashing the check IRVING provided Matthews with the money illegally received from the bank and Matthews provided a portion of the illegal proceeds to IRVING.

Both the Government and the defendant, SHONDRA IRVING, do hereby stipulate and agree the above facts set forth a sufficient factual basis for the crime to which the defendant is pleading guilty and that the government would have proven these facts beyond a reasonable doubt at trial.

JULIA K. EVANS (D.C. BAR # 435461) (DATE)
ASSISTANT UNITED STATES ATTORNEY

DEFENDANT SHONDRA IRVING (DATE)

MICHAEL P. CIACCIO, ESQUIRE (DATE)
COUNSEL FOR SHONDRA IRVING
LA. BAR ROLL NO. _____